



DAVID G. TORRES-SIEGRIST State Bar No. 220187  
TORRES+SIEGRIST LAW APC  
440 E. Huntington Dr.  
Suite 300  
Arcadia, CA 91006626  
dgts@icloud.com  
**Attorneys for Plaintiff JAY MARK CALUMPAD BALABIS**

Elaine Angelica Linga  
simplydrivenlife@gmail.com  
4625 Durfee Avenue  
El Monte, CA 91732  
626 607 7603  
Elaine Angelica Linga in Pro Per  
Defendant

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

2:23-cv-07850-JLS(Ex)

JAY MARK CALUMPAD BALABIS  
individual

Case No. ~~23-cv-02427-KK-JPR~~

Plaintiff(s),

vs.

ELAINE ANGELICA LINGA, an  
individual and also doing business as  
INVESTED LIFESTYLE and  
SIMPLYDRIVENLIFE and Does 1-50  
Defendant(s).

**DECLARATION IN SUPPORT OF  
DUE PROCESS RIGHTS AND  
TRIAL PREPARATION**

1 I, Elaine Angelica Linga, declare:

2  
3 1. I am the Defendant in this matter. I make this declaration to ensure the Court is  
4 fully informed of my efforts to comply with the Scheduling Order and to preserve  
5 my rights as a pro se litigant preparing for trial.

6  
7 2. Pursuant to the Scheduling Order issued by this Court, the parties were directed  
8 to meet and confer 'sufficiently in advance' of the deadline for filing jury  
9 instructions and verdict forms, which are due five (5) court days before the Final  
10 Pretrial Conference.

11  
12 3. Plaintiff's counsel was aware of my former attorney's forthcoming withdrawal,  
13 which was reflected on the docket. Despite this knowledge, Plaintiff's counsel  
14 made no effort to meet and confer with my former attorney before withdrawal, nor  
15 did they initiate any meet and confer process with me after I appeared in pro se.  
16

17  
18 4. On two separate occasions, March 19, 2025, and March 20, 2025, I made good  
19 faith attempts to initiate the required meet and confer. I received no substantive  
20 engagement or cooperation from Plaintiff's counsel.

21  
22 5. I undertook all efforts to comply with the Court's orders despite logistical  
23 challenges, including travel abroad. I ensured continued access to my case files and  
24 deadlines and took steps to prepare pretrial submissions independently.  
25  
26  
27  
28

1 6. On March 20, 2025, I was cc'd on two emails sent by Plaintiff's counsel to my  
2 former attorney, referencing my recent filings and asserting that I lacked authority  
3 to file a document. Plaintiff's counsel demanded that I strike the filing and stated  
4 an intention to notify the Court. These communications were made after my pro se  
5 status was entered on the docket. While I was not the direct recipient, the content  
6 was directed at my lawful filings.

7  
8 7. I respectfully assert that I had full authority to file as a pro se litigant under  
9 Local Rule 83-2.2.1, and that the formatting of my pleadings, including references  
10 to opposing counsel's firm, was consistent with Local Rule 11-3.8. Copies of the  
11 referenced emails are available and may be submitted as evidence if the Court  
12 deems them relevant.

13  
14 8. I make this declaration to preserve the record and protect my right to due  
15 process, including the right to prepare my defense, submit required materials, and  
16 participate fully in the pretrial process as a self-represented party.

17  
18 9. Notwithstanding the above, I remain willing to work in good faith with  
19 Plaintiff's counsel to comply with all remaining pretrial deadlines, and I will  
20 continue to make reasonable efforts to meet and confer on any joint submissions as  
21 required by the Court.

22  
23 9. All my filings and communications are made in good faith and are consistent  
24 with Federal Rules of Civil Procedure 1, 11, and 16, as well as the Local Rules  
25 governing pro se appearances.

1 I declare under penalty of perjury under the laws of the United States of America  
2 that the foregoing is true and correct.

3  
4 Executed on March 21, 2025 at El Monte, California

5 Elaine Angelica Linga

6 Pro Se Defendant  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28